

Exhibit 1

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF PUERTO RICO
3 PROMESA TITLE III
4 CASE NO: 17-BK-03283 (LTS)

5 IN RE: THE FINANCIAL OVERSIGHT AND
6 MANAGEMENT BOARD FOR PUERTO RICO
7 as representative of
8 THE COMMONWEALTH OF PUERTO RICO, et al.,
9 Debtor(s).

10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF PUERTO RICO
12 PROMESA TITLE III
13 CASE NO: 17-BK-03566 (LTS)

14 IN RE: THE FINANCIAL OVERSIGHT AND
15 MANAGEMENT BOARD FOR PUERTO RICO
16 as representative of
17 THE EMPLOYEES RETIREMENT SYSTEM OF THE
18 GOVERNMENT OF THE COMMONWEALTH OF PUERTO
19 RICO,
20 Debtor(s).

21 CONFIDENTIAL

22 REMOTE VIDEOTAPED EXPERT DEPOSITION UNDER
23 ORAL EXAMINATION OF
24 DR. LAURA GONZALEZ
25 DATE: August 7, 2020

REPORTED BY: MICHAEL FRIEDMAN, CCR

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1 MBA student.

2 Q Well, that's impressive. And
3 your -- what was the focus of your study in
4 your MA?

5 A Latin American literature.

6 Q I'm sorry. American literature?

7 A Latin American literature.

8 Q And did you take any classes in
9 languages?

10 A One of the classes that we had to
11 take was about terminology and how we have
12 learned so much from the languages in Latin
13 America, even before the Spaniards arrived.

14 Q And when you say "the languages of
15 Latin America," what do you mean by that?

16 A Well, the instructor was a Native
17 American lady by race, and she spoke Hitua
18 and she would -- the class was in Spanish,
19 but we studied how the Spanish language has
20 been enriched so much by the Americas.

21 Q In other words, the Spanish in
22 Latin America is different from Spanish as
23 it's spoken in Spain?

24 MR. FOX: Objection to form.

25 A We have dialects in Spain as well.

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1 Q And are the dialects in Spain
2 different than the dialects in Latin America?

3 A I am from the vast country.

4 Q The dialects in Spain are different
5 from the dialects in Latin America.

6 Correct?

7 A Yes. We are a big family.

8 Q I'm sorry. What is your answer?
9 Yes or no?

10 A We have a big family. But I have
11 not answered your previous question yet.

12 Q Oh, please answer. I'm sorry.

13 A Yes, I did have an employment
14 between finishing my MBA and finishing my
15 Masters in literature. I was a Spanish
16 instructor in the university.

17 Q And that was at Southern Illinois
18 University?

19 A Yes.

20 Q For which years were you a Spanish
21 instructor?

22 A 2002, 2003.

23 Q How many classes did you teach?

24 A I do not remember the number of
25 classes, but it went from introductory to

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1 intermediate grammar in Spanish.

2 Q And was there a specific dialect
3 that you were focused on in your teaching?

4 A No.

5 Q Do you recall how many hours you
6 spent teaching for class credit?

7 A A lot of hours because they gave me
8 tuition credit -- I mean tuition waiver. I
9 did not have to pay any tuition.

10 Q So did you teach those classes as a
11 graduate instructor?

12 A Undergraduate.

13 Q Were you a -- were you given the
14 title of a professor?

15 A No. Because in academia, you are
16 not a professor if you do not have a Ph.D.

17 Q So what was your title?

18 A I was an instructor.

19 Q Other than teaching the Spanish
20 class from 2002 to 2003, had you ever taught
21 Spanish before then?

22 A Yes.

23 Q When?

24 A In Spain.

25 Q When?

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1 A When I was an undergrad, I would
2 tutor.

3 Q Were you paid for that work?

4 A Yes.

5 Q And what -- who did -- what were
6 you tutoring in? What was the subject?

7 A Spanish and Basque. B-A-S-Q-U-E.

8 The name for the language is Euskera. E --
9 sorry, I'm doing it in Spanish.

10 E-U-S-K-E-R-A.

11 Q So Dr. Gonzalez, you did some
12 tutoring in Spain during your undergrad.
13 You've taught a Spanish class at Southern
14 Illinois University as an undergraduate
15 instructor, 2002 to 2003.

16 Did you ever teach any other
17 Spanish classes?

18 A I taught several classes as a
19 Masters student, and I tutored again while I
20 was doing any Ph.D.

21 Q Are any of those classes or Spanish
22 instruction included on your CV?

23 A No.

24 Q Why not? Why not?

25 A Okay. Two days before I took my

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1 first class in English, in finance, I was
2 asked by the Ph.D. coordinator at the
3 University of Florida how many students I had
4 in my class. I said I did not know.

5 And he said, "Because the students
6 will see your name, and they will think here
7 is another Mexican that speaks no English."

8 Q And that is why you don't include
9 your Spanish teaching on your CV?

10 A No.

11 Q Okay. My question was: Why is
12 that experience not on your CV?

13 A There were other experiences.

14 Q When was the last time you taught a
15 Spanish class, Dr. Gonzalez?

16 A Paid or unpaid?

17 Q Paid?

18 A When I was a Ph.D. student.

19 Q Okay. And where did you teach
20 then, at the University of Florida?

21 A I was a tutor at the University of
22 Florida.

23 Q Other than your tutoring
24 experience, am I correct in understanding the
25 only Spanish class you taught as an

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1 instructor was the class at Southern Illinois
2 from 2002 to 2003?

3 A It was more than one class.

4 Q Other than the classes that you
5 taught as an instructor from 2002 to 2003,
6 have you ever been an instructor in a Spanish
7 class since then?

8 A No.

9 Q Before then?

10 A No.

11 Q Okay. So let's go back to your MA,
12 which you said had a focus in Latin American
13 literature.

14 Did you have any focus during your
15 MA on Spanish as it was spoken or written in
16 Puerto Rico?

17 A I do not remember specifying Puerto
18 Rico.

19 Q Did you write a thesis for your MA?

20 A Yes.

21 Q What was the topic?

22 A My thesis was written in Spanish
23 and the topic was Malinche. I can spell it.
24 It's M-A-L-I-N-C-H-E.

25 Q After you received your MA, you

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1 time in terms of the chronology of your
2 professional jobs?

3 You're currently a professor at
4 California State University at Long Beach.

5 Correct?

6 A Yes.

7 Q Okay. On Paragraph 1 of your
8 expert report you write, "I have experience
9 as a translator for the University of Florida
10 School of Law, translating between English
11 and Spanish. "

12 Do you see that?

13 A Yes.

14 Q Okay. Let's talk about that for a
15 little bit.

16 This translating experience was
17 from 2005 to 2006.

18 Is that right?

19 A I just go by my CV. I have
20 forgotten.

21 Q Okay. It's been a long time.

22 Was it a paid position?

23 A It's very little.

24 Q Was it full-time or part-time?

25 A Part-time.

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1 Q Do you recall about how much time
2 you spent at that job translating?

3 A I know -- I know I was not taking
4 classes at that time. I think it was -- we
5 were in between semesters, so I was -- some,
6 I was -- I was devoted to it.

7 But not as long as this report.

8 Q Okay. So something less than the
9 amount of time you spent preparing this
10 report?

11 A Yes.

12 Q But if I recall correctly, you
13 don't know how long you spent preparing this
14 report.

15 Right?

16 A Yeah, but this one has been long
17 and hard.

18 Q Okay. Could you give me a
19 ballpark?

20 Do you think you've spent a hundred
21 hours preparing this report?

22 A I don't remember.

23 Q Okay. But if you wanted to know,
24 you would go back and you would look at those
25 hours that you spent on a weekly basis to

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1 GLG.

2 Right?

3 A Yes.

4 Q And your recollection is that this
5 translating experience in 2005 to 2006 is
6 something less than the amount of time that
7 you spent working on this report.

8 Right?

9 A Yes, because I have never written a
10 report before.

11 Q Okay. Did you receive any training
12 for the translating job that you had in 2005
13 to 2006?

14 A No.

15 Q Were you -- what were you
16 translating? English, Spanish, something
17 else?

18 A I was translating from English into
19 Spanish, and Spanish into English.

20 Q What's the difference between
21 translating from English into Spanish and
22 translating from Spanish into English?

23 MR. FOX: Objection to form.

24 A I prefer to translate from Spanish
25 into English.

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1 was a discussion about establishing
2 partnership with a Spanish university. And a
3 representative from Spain came, and so I had
4 to host and translate.

5 Then, here in California, I have a
6 title, "First Generation Mentor." About half
7 of our students, half Spanish, as -- yeah,
8 about half of our students in Long Beach,
9 half-Spanish as their mother tongue, mother
10 language. And they are first generation and
11 they need mentors.

12 So I do that. And when I mentor
13 these students within the program, and also
14 my students, many times I speak Spanish in a
15 professional context.

16 Q Do you have, Dr. Gonzalez, any
17 professional certifications in translation?

18 A No.

19 Q Do you belong to any translation
20 associations or groups?

21 A No.

22 Q Are there any individuals who you
23 believe are authorities in the field of
24 translation?

25 A I do not know.

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1 activities, as I have been mentioning before,
2 that has been something continuous for 20
3 years.

4 Q In a mentoring capacity?

5 A And also in a professional capacity
6 helping professors.

7 Q Okay. You're going to have to
8 break that down for me because I'm not sure
9 we covered that in our prior discussion.

10 When you say "a professional
11 capacity helping professors," what do you
12 mean by that, Dr. Gonzalez?

13 A Well, if they need to understand
14 something in Spanish, they ask me.

15 Q Now, obviously, Dr. Gonzalez, you
16 are a native Spanish speaker.

17 Right?

18 A Yes.

19 Q Okay. And you grew up in Spain?

20 A Yes.

21 Q Have you ever been to Puerto Rico?

22 A Yes.

23 Q How many times?

24 A Once.

25 Q When?

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1 A I think -- I think it was 2014.

2 Q 2014?

3 A I think.

4 Q And what was the purpose for that
5 visit?

6 A To know the beautiful place.

7 Q Was it -- and so it was a vacation?

8 A Yes.

9 Q How long were you in Puerto Rico
10 for that vacation?

11 A I think it was between a week and
12 ten days, but I don't remember.

13 Q And were you in San Juan? Did you
14 travel the island?

15 Tell me a little bit about where
16 you were in Puerto Rico.

17 A I wanted to see as much as
18 possible. And so, a few days in beautiful
19 San Juan, and then beautiful islands, I think
20 it was a Culebra, one of them, very famous.
21 And I think another one was -- I forgot.

22 But I visited two islands.

23 Q Okay. Did you engage in any
24 linguistic studies or coursework when you
25 were in Puerto Rico?

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1 A No.

2 Q Have you ever worked for any Puerto
3 Rico-based universities?

4 A No.

5 Q Have you ever worked for any Puerto
6 Rico-based companies?

7 A No.

8 Q Putting aside this particular
9 engagement, have you ever translated
10 informally or translated informally words
11 that were written or spoken in a Puerto Rican
12 publication of law?

13 MR. FOX: Objection to form.

14 A I do not remember.

15 Q Have you taken any coursework in
16 the Puerto Rico dialect?

17 A No.

18 Q Are you familiar with the Puerto
19 Rico dialect?

20 A Yes.

21 Q How would you describe it?

22 A Because of my friends.

23 Q How would you describe it?

24 MR. FOX: Object to form.

25 MS. ROOT: Well, she said she's

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1 familiar with the Puerto Rico dialect.

2 Q So tell me what you know about the
3 Puerto Rico dialect, Dr. Gonzalez.

4 A I like talking to Puerto Rican
5 people.

6 Q Is there anything else you can tell
7 me about your knowledge of the Puerto Rican
8 dialect?

9 A I just enjoy listening.

10 Q Anything else?

11 A They are wonderful people.

12 Q Are you aware of anything that is
13 unique to the Puerto Rican dialect?

14 A When you spend 20 years in the
15 United States, at the end, you don't really
16 pay attention to the differences. You sort
17 of understand, you pay attention to what you
18 have in common.

19 Q So is your answer to my question,
20 "Are you aware of anything that is unique to
21 the Puerto Rican dialect," no?

22 A When I talk with people from
23 anywhere in the Americas, I do not take notes
24 in the conversation. We understand each
25 other and we have a lot of things in common.

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1 Q Yes or no, Dr. Gonzalez. Are you
2 aware of anything that is unique to the
3 Puerto Rico dialect?

4 MR. FOX: Objection, asked and
5 answered.

6 A I do not remember.

7 Q Isn't it true, Dr. Gonzalez, that
8 there are differences between Spanish as
9 spoken and written in Puerto Rico, and
10 Spanish as spoken and written in Spain?

11 A Where in Spain?

12 Q Anywhere in Spain.

13 A That is not correct.

14 Q What isn't correct about what I
15 said?

16 A Different regions of Spain speak
17 different Spanish.

18 Q And isn't it true -- what region of
19 Spain are you from, Dr. Gonzalez?

20 A I'm from the vast country, but my
21 father is Castilian.

22 Q Okay. Isn't it true, Dr. Gonzalez,
23 that there are differences between Spanish as
24 spoken and written in Puerto Rico, and
25 Spanish as spoken and written in the vast

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1 to mean, since it's in your report?

2 A That I was able to translate the
3 paragraph.

4 Q That's -- that is what you think it
5 means to be an expert?

6 A That I have the preparation to
7 translate that paragraph.

8 Q Do you have specific expertise in
9 translating between Spanish as it is spoken
10 and written in Puerto Rico, and English?

11 A No.

12 MR. FOX: Objection.

13 Q Okay. How would you as a native
14 Spanish speaker from Spain, say, for example,
15 the fruit "orange"?

16 A Say again?

17 Q The fruit "orange." How would you
18 say that as a native Spanish speaker?

19 A "Naranja."

20 Q How would a native Puerto Rican
21 Spanish speaker say the fruit "orange"?

22 A I do not know.

23 Q How would you as a native Spanish
24 speaker say the word "bus"? Please spell
25 your answer, Dr. Gonzalez.

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1 A Okay. So "bus" in English would be
2 translated in Spanish from Spain, but I have
3 heard others. In Spanish from Spain, it
4 would be "autobus," A-U-T-O-B-U-S.

5 Q And Dr. Gonzalez, how would --

6 MR. FOX: Melissa --

7 A Actually, I have to say something.

8 Q Sure.

9 A I know that in Spain, there is
10 another term. For example, in the Canary
11 Islands, they call it "la guagua." So there
12 are other terms. And for example, another
13 one in Spain is "guagua," G-U-A-G-U-A.

14 And there are other ones in other
15 places, but that would be the one that I'm
16 familiar with.

17 MR. FOX: And just for the record,
18 I see that transcript says -- records an
19 answer of "I don't know" for how to say
20 "orange" in Spain as a native Spanish
21 speaker, and I just want to note for the
22 record that that's not a correct
23 translation. Dr. Gonzalez answered in
24 Spanish.

25 Q Dr. Gonzalez, I asked you the

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1 question, "How would you as a native Spanish
2 speaker from Spain say the fruit orange?"

3 Can you give the testimony?

4 And if you use a Spanish word,
5 spell it for the record, please.

6 A Yes. The way I would call an
7 orange would be "naranja," N-A-R-A-N-J-A.

8 Q Thank you. Dr. Gonzalez, how as a
9 native Spanish speaker from -- strike that.

10 Dr. Gonzalez, do you know how a
11 Puerto Rican Spanish speaker -- do you know
12 how a native Puerto Rican Spanish speaker
13 would say the English word "bus"?

14 A I have heard so many different
15 words that I do not recall which ones are
16 from different dialects.

17 Q How would you, Dr. Gonzalez, as a
18 native Spanish speaker from Spain, say the
19 word "computer?"

20 And I'd ask that if you use a
21 Spanish word, you spell it for the record.

22 A Well, when I go to Spain, many
23 times I use terms that are not used in the
24 United States, and they tell me that I am
25 either becoming a gringa or something else.

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1 So before coming to the United States, I
2 would have said "ordenador." And the
3 spelling is O-R-D-E-N-A-D-O-R.

4 But many times now, when I go
5 there, I say "computadora." That is C -- do
6 you want me to spell that one?

7 Q Yes, please. Thank you. My bad.

8 A Okay. And that one I have learned
9 here in the Americas. So it's
10 C-O-M-P-U-T-A-D-O-R-A.

11 Q Dr. Gonzalez, do you know how a
12 native Puerto Rican Spanish speaker would say
13 the word "computer"?

14 A Again, I have heard in 20 years so
15 many words from friends from different places
16 that I have a flexible ear.

17 Q Is the answer to my question, "Do
18 you know how a Puerto Rican Spanish speaker
19 would say the word computer," no?

20 A I am not sure because I am exposed
21 to different dialects and I do not
22 compartmentalize. We are family.

23 MS. ROOT: David, this might be a
24 good time for a short break. Do you
25 want to take ten minutes?

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1 would just ask that you listen to the
2 question and obviously give your testimony.

3 But it does seem that your answers
4 don't quite line up with my questions. So
5 let me start again.

6 On page 4, you list six materials
7 that you considered in preparing the report.

8 Correct?

9 A I considered the following
10 materials, that is correct.

11 Q And then, on pages 7 and 8, there
12 are links to other materials that you
13 considered that are not listed -- there are
14 links to other materials that you considered.

15 Correct?

16 A Yes.

17 Q Other than the links that are on
18 pages 7 and 8 and the materials that are in
19 Paragraph 3, are there any other materials
20 that you considered in preparing your report?

21 A No.

22 Q You did not look at any other
23 Puerto Rican laws other than what's included
24 in Paragraph 3.

25 Correct?

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1 A Correct.

2 Q You did not consider any scholarly
3 articles on translation.

4 Correct?

5 A No.

6 Q You did not look at any other
7 examples of where "tomar," T-O-M-A-R,
8 "prestado," P-R-E-S-T-A-D-O, was used in
9 Puerto Rico or anywhere else in the world
10 other than what's in Paragraph 3 and what is
11 on -- what is on pages 7 and 8 of your
12 report.

13 Correct?

14 A And the dictionary.

15 Q And the dictionary.

16 Correct?

17 A Yes.

18 Q Let's go back to talking about the
19 methodology for translation.

20 In your view, when translating a
21 word or words within a paragraph, is it
22 important to consider the context in which
23 those words are used in the paragraph?

24 A I was not asked to consider
25 context.

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1 as "borrow" is very robust across different
2 dialects of Spanish, across different regions
3 and nations where the tongue is an official
4 language.

5 Q Let me ask you my question again.

6 Is it important to consider dialect
7 when you are translating? Yes or no?

8 A In this translation, I considered
9 six documents listed on page 4 and I
10 considered other references listed on pages 7
11 and 8 that confirmed the standard use of
12 "tomar prestado" across dialects.

13 Q Dr. Gonzalez, I'm not asking you a
14 question about "tomar prestado."

15 My question is: When you're
16 translating, is it important to consider
17 dialect? Yes or no?

18 A When you are translating, you hear
19 the dialects, because you hear different
20 terms.

21 Q For example, I recall earlier, you
22 spoke of Brazilian Portuguese.

23 Right? Do you recall that?

24 A Yes.

25 Q Because Brazilian Portuguese is a

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1 different dialect than Portuguese.

2 Right?

3 A Yes.

4 Q There are differences in those
5 dialects?

6 A Yes.

7 Q And so if I wanted to translate
8 something that was in Brazilian Portuguese
9 into English, it would be important for me to
10 consider the dialect, Brazilian Portuguese,
11 that it was written in.

12 Right?

13 MR. FOX: Object to foundation.

14 A As I mentioned in page 7, the
15 translation of the "tomar prestado" as
16 "borrow" is very robust across different
17 dialects of Spanish across different regions
18 and nations where the tongue is an official
19 language.

20 Q Dr. Gonzalez, my question wasn't
21 about "tomar prestado" or page 7 of your
22 report. My question was about Brazilian
23 Portuguese.

24 Can you answer my question? If I
25 wanted to translate something from Brazilian

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1 All my electives were in Latin American and
2 Spanish, but mostly Latin American text.

3 I had to do all the exams in
4 Spanish for all those courses. Then I wrote
5 a thesis that was peer reviewed by scholars
6 of Spanish of different nationalities.

7 I have been doing formal
8 translation for many years. And there are
9 some things in Spanish that are standard.

10 Q Is Puerto Rico part of Latin
11 America?

12 A What do you mean by "Latin
13 America"?

14 Q You said you spent all this time
15 studying in Latin America, so I'm using your
16 view.

17 What do you mean by Latin America,
18 Dr. Gonzalez? And under your definition, is
19 Puerto Rico part of it?

20 A There are many different
21 definitions of Latin America. If we consider
22 Latin as the origin of the Roman's languages,
23 that would include the speakers of Portuguese
24 as well in the Americas.

25 But since I did my Masters in

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1 English, French, and Spanish, I mean the
2 Spanish in the Americas.

3 Q So do you include Puerto Rico in
4 your personal definition of Latin America?

5 A Puerto Rico -- the people of Puerto
6 Rico have been speaking Spanish in the
7 Americas for centuries like the Spanish
8 speakers in all the other countries. And in
9 all other areas, I know that Puerto Rico is
10 not a country in all the other areas in the
11 Americas.

12 Q My question was different.
13 Is Puerto Rico part of Latin
14 America?

15 A The Spanish speakers of the
16 Americas, that's what I mean.

17 Q Okay. Can you answer my question?
18 Is Puerto Rico part of Latin
19 America?

20 A I will not enter for my
21 definitions.

22 Q You have no view sitting here as to
23 whether Puerto Rico is or is not part of
24 Latin America?

25 A I am a very inclusive person.

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1 Q Okay. And that's a wonderful
2 attribute to have.

3 My question is: Do you have a view
4 as to whether Puerto Rico is part of Latin
5 America, yes or no?

6 MR. FOX: Object to form.

7 A My Masters in foreign languages and
8 literatures was in English, French, and
9 Spanish. In English, we studied pedagogy.
10 Then, in French, it was basic communication,
11 business communication.

12 And all the other courses that I
13 took were Spanish -- Spanish-speaking
14 literature, both in Europe and in the
15 Americas.

16 Q Okay. Dr. Gonzalez, you still
17 haven't answered my question.

18 Is Puerto Rico part of Latin
19 America?

20 A I do not understand your question.

21 Q Okay. In Paragraph 2 on page 6,
22 "The official translation from Spanish into
23 English is inaccurate," you write, "The
24 official translation translates tomar
25 prestado as seek alone instead of borrow.

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1 A General verbal phrase.

2 Q And can -- and using your phrase,
3 "umbrella term," can the context in which an
4 umbrella term is used limit the scope of the
5 umbrella term?

6 A Yes, but it doesn't change the
7 translation.

8 Q In Paragraph 3 on page 7, you write
9 that there are two different meanings or two
10 different usages of "tomar prestado." One
11 means to temporarily take something with the
12 intention of returning it. And the phrase
13 can also be used for intangibles in
14 expressions."

15 Do you see that?

16 A Yes.

17 Q In Section 779, is "tomar prestado"
18 used to mean to temporarily take something
19 with the intention of returning it, or is it
20 used for intangibles in expressions?

21 A The translation is "to borrow
22 from."

23 Q And you say in Paragraph 3 that in
24 the Spanish language, "tomar prestado" means
25 to temporarily take something with the